IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

CHRISTIAN GARCIA,	)	
Plaintiff,	)	
v.	)	Case No.: 1:15-cv-1324 (LO/IDD)
OFFICER GREGORY HOLDEN, et al,	)	
Defendants.	)	

OBJECTIONS AND MOTION TO QUASH SUBPOENA TO PRODUCE DOCUMENTS

COMES NOW the defendant, GREGORY HOLDEN ("Holden"), by counsel, who objects and moves the court to quash, in part, the Subpoena to Produce Documents filed by plaintiff pursuant to Fed. R. Civ. P. 45 and served on defendant's employer, the City of Alexandria Police Department; in support thereof, defendant states as follows:

Plaintiff issued a subpoena to produce documents pursuant to Fed. R. Civ. P. 45 which was served on the City of Alexandria Police Department. Attached to this motion is copy of the schedule of documents which accompanied that subpoena request. Holden objects and moves to quash the request outlined in paragraph 4 for copy of his personnel file. This request is not only overly broad, but it seeks information which is neither relevant nor designed to lead to any admissible evidence, but seeks confidential information contained in the defendant's personnel file. Defendant Holden requests that this portion of the request be quashed and the City be directed not to disclose or produce the information or the personnel file documents.

WHEREFORE, for the foregoing reasons, and for additional reasons as argued in defendant's accompanying memorandum, defendant Gregory Holden requests that the plaintiff's subpoena to produce his personnel file documents served on the City of Alexandria be quashed and that his personnel file be withheld from production and not produced by the City.

OFFICER GREGORY HOLDEN

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of June, 2016, I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) to the following:

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